

**EXHIBIT 2 TO PLAINTIFFS' RULE 37(C) MOTION:
TABLE OF PLAINTIFFS' REQUESTS FOR PRODUCTION
IDENTIFYING DESIGNATED MATTERS ON WHICH DEFENDANTS
ARE TO BE PROHIBITED FROM INTRODUCING NEW EVIDENCE**

Number	Request for Production
No. 1 to BCC	Please produce the daily roster, shift log, or other records identifying the names, positions, and working hours of each Bernalillo County employee and contractor on duty in the F Unit of the Metropolitan Detention Center from 12:01 a.m. on October 4, 2016, until 11:59 p.m. on October 20, 2016.
No. 2 to BCC	Please produce the daily roster, shift log, or other records identifying the name, positions, and working hours of each Bernalillo County employee and contractor on duty in any medical unit or health-care facility for inmates at the Metropolitan Detention Center from 12:01 a.m. on October 4, 2016, until 11:59 p.m. on October 20, 2016.
No. 3 to BCC	Please produce the records which set forth the medical policies and procedures for the Metropolitan Detention Center in effect during the month of October 2016, including standard operating procedures regarding inmate access to health care and operation of any medical unit or health-care facility at the Metropolitan Detention Center for that period.
No. 4 to BCC	Please produce the version of the inmate handbook, video recording, or other record provided to orient new inmates to the Metropolitan Detention Center and notify them of rules or procedures applicable to inmates in effect during the month of October 2016.
No. 9 to BCC	Please produce the records of statements given or made by Plaintiff Shawna Tanner to officers or agents of Bernalillo County, including Bernalillo Sheriff's Department detectives, health-care providers, counselors, investigators, and corrections officers between October 4, 2016, and the present.
No. 10 to BCC	Please produce the records for the calendar year 2016 which evince the efforts by officials, employees, and agents of Bernalillo County to monitor and enforce compliance with the provisions of the County's "Agreement for Medical, Dental, Mental Health, Psychiatric and Methodone Services for the Metropolitan Detention Center" with Correct Care Solutions, LLC, dated on or about December 9, 2014, as amended.
No. 11 to BCC	Please produce the records in your possession, custody, or control identified in your answer to Interrogatory No. 1 above.
No. 13 to BCC	Please produce the records in your possession, custody, or control identified in your answer to Interrogatory No. 3 above.

No. 16 to BCC	Please produce the principal and material records which state or describe the job duties, job descriptions, qualification requirements, and job vacancy announcements for the following posts or duty stations in the MDC's Health Services Unit identified in the daily rosters you produced in response to Plaintiff's Request for Production No. 2: P4 FEM, INF FRONT, INF REAR, PAC ROVER, PAC ROV FEM, and MED ROV.
No. 17 to BCC	Please produce the records in your possession, custody, or control documenting the training on inmate health care that was provided to the following Metropolitan Detention Center staff, including training on recognizing emergencies, procedures for referring inmates for health care, and care of pregnant inmates from December 9, 2014, until November 30, 2016: Toni Fastenau, Claudia Rodriguez-Nunez, Rebecca Macias, Martina Sanchez-Filfred, and Tina M. Munoz.
No. 1 to CCS	Please produce the records in your possession, custody, or control identified in your answer to Interrogatory No. 1 above.
No. 2 to CCS	Please produce the records in your possession, custody, or control identified in your answer to Interrogatory No. 2 above.
No. 3 to CCS	Please produce the records in your possession, custody, or control identified in your answer to Interrogatory No. 3 above.
No. 5 to CCS; No. 15 to BCC	Please produce the principal and material records on which you rely to support each of the affirmative defenses pleaded in your Answer to Plaintiff's Complaint (Doc. 1).
No. 6 to CCS	Please produce the principal and material records (such as time sheets, daily rosters, shift logs, attendance records, and/or staffing plans) which identify the names, job titles or positions, duty stations or posts, and working hours of each of your employees or contractors on duty at the Metropolitan Detention Center for each shift from 12:01 a.m. on October 4, 2016, until 11:59 p.m. on October 20, 2016.
No. 7 to CCS	Please produce the principal and material records which state or contain job descriptions, qualification requirements, and job vacancy announcements for the following positions at MDC during the calendar years 2015 and 2016: Health Services Administrator or Health Administrator, Medical Director, Physician, Director of Nursing (DON-RN), Charge Registered Nurse (Charge-RN), Medical Registered Nurse (Medical-RN), Licensed Practical Nurse-Medical (LPN-Medical), Emergency Medical Technician-Basic (EMT-Basic), and Emergency Medical Technician-Paramedic (EMT-Paramedic).

No. 8 to CCS	Please produce the principal and material records documenting the name, date, job title or position, duty station or post, and reasons for each instance in which an individual ended his or her employment with you or otherwise stopped working for you at the Metropolitan Detention Center between June 1, 2016, and November 30, 2016.
No. 9 to CCS	Please produce the principal and material records documenting the name, date, job title or position, duty station or post, and reasons for each instance in which an individual began his or her employment with you or otherwise started working for you at the Metropolitan Detention Center between June 1, 2016, and November 30, 2016.
No. 10 to CCS	If you contend that any of your employees who are named as Defendants in this civil action had no material role in providing health care to Plaintiff Shawna Tanner or responding to requests for health care by or on behalf of Plaintiff Tanner between October 4, 2016, and October 20, 2016, please produce the principal and material records in your possession, custody, or control on which you rely to support that contention.
No. 11 to CCS	Please produce the records in your possession, custody, or control documenting the training that you provided to Metropolitan Detention Center staff, including training on recognizing emergencies and procedures for referring inmates for health care, from December 9, 2014, and until November 30, 2016.
No. 14 to CCS	Please produce the records in your possession, custody, or control which were created, edited, processed, or discovered between October 4, 2016, and the present, and which document the investigation, diagnosis, or treatment of Plaintiff Shawna Tanner's pregnancy, the stillbirth of her baby, and the medical complications associated with those events during her incarceration at the Metropolitan Detention Center from October 4, 2016, to October 20, 2016, including medical records, incident reports, audit reports, inspection reports, mortality reports, internal investigation records, sheriff's department investigation records, and contract compliance records, but not including attorney work product generated by your counsel of record in this case.
No. 15 to CCS; No. 19 to BCC	Please produce the records in your possession, custody, or control listing all pregnancies at the Metropolitan Detention Center and their outcomes for the calendar years 2015 and 2016. If you contend that those records are privileged or otherwise protected from disclosure, please produce a privilege log sufficient for Plaintiff's counsel and the Court to assess the validity of your claim of privilege or other protection with respect to each responsive record.

No. 23 to BCC	Please produce the records in your possession, custody, or control which were provided to or reviewed by officials or staff of the National Commission on Correctional Health Care (NCCHC) during or in relation to their survey, tour, and accreditation reporting regarding the Metropolitan Detention Center (MDC) in 2018, not including health records regarding individual inmates which are protected by the Health Insurance Portability and Accountability Act (HIPAA).
No. 16 to CCS	Please produce the records in your possession, custody, or control which log or document clinical performance enhancement reviews and independent reviews of registered nurses (RNs) working at the Metropolitan Detention Center (MDC) for the calendar years 2015 and 2016, including records which document compliance or non-compliance with Standard No. J-C-02 (Clinical Performance Enhancement) of the 2014 edition of the National Commission on Corrections Health Care (NCCHC) Standard for Health Services in Jails.
No. 17 to CCS	Please produce the records in your possession, custody, or control which log or document annual skills testing of registered nurses (RNs) working at the Metropolitan Detention Center (MDC) for the calendar years 2015 and 2016.
No. 18 to CCS	Please produce the records in your possession, custody, or control which log or document nursing assessment protocols in effect for nursing staff at the Metropolitan Detention Center (MDC) during the calendar years 2015 and 2016, including records which document compliance or non-compliance with Standard No. J-E-11 (Nursing Assessment Protocols) of the 2014 edition of the National Commission on Corrections Health Care (NCCHC) Standard for Health Services in Jails.
No. 19 to CCS	Please produce the records in your possession, custody, or control which document the employment-related training that CCS provided to any individuals employed as or assigned the duties of Director of Nursing at the Metropolitan Detention Center (MDC) during the calendar years 2015 and 2016.
No. 20 to CCS	Please produce the records in your possession, custody, or control which document the employment-related training that CCS provided to any individuals employed as or assigned the duties of Charge Nurse on a weekly or full-time basis during the calendar years 2015 and 2016.
No. 21 to CCS	Please produce the records in your possession, custody, or control which document the training that CCS provided to the following registered nurses from the date they were first hired to work at MDC until October 20, 2016: Adriana Luna (Trujillo), Taleigh Sanchez, Elisa Manquero, and Anthony Spencer.

No. 22 to CCS	Please produce the records in your possession, custody, or control which document the attendance records, certificates, licenses, credentialing, discipline reports, job and employment applications, leave of absence records, performance evaluations, personnel files, promotion records, resumes and CVs, timesheet/timecard records, time-off records, vacation records, and work evaluation reports for the following individuals from the date they were first hired or became your employees until October 31, 2016: Defendant Timothy I. McMurray, M.D., Defendant Adriana Trujillo (f/k/a Luna), R.N., Defendant Taileigh Sanchez, R.N., Defendant Elisa Manquero, R.N., Defendant Christopher Mercer, P.A., and Defendant Ed Kossmann (a/k/a Kossman).
No. 23 to CCS	Please produce the records in your possession, custody, or control which document the training on the subject of counseling and care of the pregnant inmate, including prenatal care and obstetrics, received by or provided to the following individuals from the date they were first hired or became your employees until October 31, 2016: Defendant Timothy I. McMurray, M.D.; Defendant Adriana Trujillo (f/k/a Luna), R.N.; Defendant Taileigh Sanchez, R.N.; Defendant Elisa Manquero, R.N.; Defendant Christopher Mercer, P.A.; Defendant Ed Kossmann (a/k/a Kossman); Anthony Spencer, R.N.; Keith Drummond, EMT-Paramedic; Ruby Boyd, EMT.
No. 24 to CCS; No. 27 to BCC	Please produce the following records referenced in Health Care Deposition Exhibit 12, entitled "HCA 12.53 Counseling and Care of the Pregnant Inmate," and Bates-numbered Tanner v. Bernalillo County 000273-000277": 1. Clinical Protocol B07, Use of Onsite Pregnancy Test 2. Clinical Protocol J04, Pregnancy 3. Clinical Protocol J05, Preterm Labor.
No. 25 to CCS; No. 28 to BCC	Please produce all records in your possession, custody, or control that you or your agents, including your attorneys, provided to any expert witnesses that any Defendant has retained to testify in this matter.
No. 26 to CCS; No. 29 to BCC	Please produce all records in your possession, custody, or control that may provide a basis for the opinions expressed by any expert witness retained by any Defendant in this case.

No. 30 to BCC	Please produce all records in your possession, custody, or control that document the training on recognizing emergencies and procedures for referring inmates for health care which employees or agents of Correct Care Solutions, LLC provided to the following employees of Bernalillo County: Claudia Rodriguez-Nunez, Martina Sanchez-Filfred, Tina M. Munoz, Louie Romero, Drew H. Douglas, and Leah Jackson.
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